

PERKINS COIE LLP

607 FOURTEENTH STREET, N.W. · WASHINGTON, D.C. 20005-2011

TELEPHONE: 202 628-6600 · FACSIMILE: 202 434-1690

February 14, 2000

Lawrence Noble
General Counsel
Federal Election Commission
999 E Street, NW, 6th Floor
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
FEB 14 1 03 PM '00

Re: MURs 4956, 4962 and 4963

Dear Mr. Noble:


This constitutes the response of Bill Bradley for President, Inc. and Theodore V. Wells, Jr., as Treasurer (collectively, the "Committee"), to the complaints filed by Patricia D. Salisbury on December 30, 1999 and January 10, 2000. Insofar as they pertain to the Committee, these complaints should be dismissed.

Ms. Salisbury is a supporter of candidate Lyndon H. LaRouche, Jr. Her complaints are essentially the same. Each claims that news media outlets have invited Bill Bradley and Al Gore to participate in debates, that they have not invited Mr. LaRouche, and that "any objective criteria" require Mr. LaRouche's invitation.

The complaints present no violation of the Federal Election Campaign Act ("the Act") by the Committee. They do not claim that the Committee violated the Act. Rather, they claim only that the sponsors, being corporations, made prohibited expenditures under the Act. In any event, the Committee is unaware that the sponsors used anything other than objective criteria in selecting candidates to participate.

The Committee respectfully requests that the Commission promptly dismiss these complaints.

Very truly yours,



Robert F. Bauer
Brian G. Svoboda
Counsel to the Committee

Enclosures

[21507-0001/DA003671.809]

STATEMENT OF DESIGNATION OF COUNSEL

MUR

4962

NAME OF COUNSEL: ROBERT F. BAUER/JUDITH L. CORLEY

ADDRESS:

PERKINS COIE LLP

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WASHINGTON, D.C. 20005-2011

TELEPHONE:

202-434-1602/202-434-1622

The above-named individual ^{are} ~~is~~ hereby designated as my
counsel and ^{are} ~~is~~ authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

2000-02-01

Date

P D Nichols

Signature Peter D. Nichols

Assistant Treasurer

RESPONDENT'S NAME: BILL BRADLEY FOR PRESIDENT, INC.

ADDRESS:

395 PLEASANT VALLEY WAY

WEST ORANGE, NJ 07052

HOME PHONE:

BUSINESS PHONE:

973-731-2100

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